

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS

UNITED STATES OF AMERICA)
)
) No. 4:12CR00142 JMM
v.)
)
MARK JONES)

**GOVERNMENT'S RESPONSE TO DEFENDANT'S MOTION
TO MODIFY RELEASE CONDITIONS**

The United States of America, by and through its counsel, Christopher R. Thyer, United States Attorney for the Eastern District of Arkansas, and Anne Gardner, Assistant United States Attorney, for its response states:

The government objects to modifying the defendant's conditions of release to remove electronic monitoring. The condition was imposed to mitigate the defendant's risk of flight. The risk of flight was based in part on the defendant's recorded conversation in which he acknowledged that he had access to personal identifiers of other individuals for use in creating false titles to vehicles. There has been no further evidence submitted to show the defendant's flight risk no longer exists. If the court deems that electronic monitoring of the defendant is no longer warranted, the government requests that his travel be restricted to the State of Arkansas unless he receives specific authorization to travel elsewhere by court order.

Respectfully submitted,

CHRISTOPHER R. THYER
United States Attorney

/s/ Anne E. Gardner

By: _____
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CERTIFICATE OF SERVICE

I hereby certify that the above Response was served upon defense counsel in this case pursuant to electronic filing requirements, this the 9th day of August, 2012.

/s/ Anne E. Gardner

Anne E. Gardner